

-----X	
JOHNNY M. HUNT,	:
	:
Plaintiff,	:
	:
-against-	:
	:
SOUTHERN BAPTIST CONVENTION,	:
GUIDEPOST SOLUTIONS LLC, and	:
EXECUTIVE COMMITTEE OF THE SOUTHERN	:
BAPTIST CONVENTION,	:
	:
Defendants.	:
-----X	

Defendant Guidepost Solutions LLC (“Guidepost”) makes the following initial disclosures (the “Disclosures”) pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. Guidepost provides the Disclosures to the best of its knowledge and on the basis of the information available as of this date. Guidepost reserves the right to alter, amend, supplement, augment, or otherwise change the Disclosures as appropriate. No response or lack of response herein shall be understood to limit the legal theories, factual contentions, or evidence to be employed, relied upon, or presented by Guidepost during any proceeding in this case.

Initial Disclosure (A)(i):

Guidepost identifies the following individuals likely to have discoverable information (along with the subjects of that information) that may be used to support its claims or defenses:

Name	Subjects
Samantha Kilpatrick, Sr. Managing Director, Guidepost	<ul style="list-style-type: none">• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses• Guidepost's drafting, editing, and finalization of the relevant portion of the Report
Russell Holske Jr., Sr. Managing Director, Guidepost	<ul style="list-style-type: none">• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses• Guidepost's drafting, editing, and finalization of the relevant portion of the Report
Julie Myers Wood CEO, Guidepost	<ul style="list-style-type: none">• Guidepost's structure, operations, policies, and procedures• Scope of SBC's engagement of Guidepost
Krista Tongring, Sr. Managing Director, Guidepost	<ul style="list-style-type: none">• Guidepost's investigation of Complainant's allegations against Plaintiff, including interviews of relevant witnesses• Guidepost's drafting, editing, and finalization of the Report
Johnny M. Hunt	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff• Guidepost's investigation of Complainant's allegations against Plaintiff• Plaintiff's claims in this action
Complainant	<ul style="list-style-type: none">• Allegations against Plaintiff• Guidepost's investigation of allegations against Plaintiff
Complainant's Husband	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff• Guidepost's investigation of Complainant's allegations against Plaintiff
Roy Blankenship	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff• Communications with Plaintiff, Complainant, and Complainant's Husband• Guidepost's investigation of Complainant's allegations against Plaintiff
Witness 1	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff
Witness 2	<ul style="list-style-type: none">• Complainant's allegations against Plaintiff

Witness 3	<ul style="list-style-type: none"> • Complainant's allegations against Plaintiff
Janet Hunt	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Jim Law	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Kevin Ezell, President, NAMB	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Anna Gage	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Christopher Lee	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Matt Lawson	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Mark Hoover	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Mike Whitson	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Steven Kyle	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Benny Tate	<ul style="list-style-type: none"> • Plaintiff's confession and other communications regarding Complainant and marital counseling
Members of the SBC Executive Committee	<ul style="list-style-type: none"> • Facts regarding the scope of the Report as it concerns Plaintiff
Bruce Frank	<ul style="list-style-type: none"> • Information regarding SBC's engagement of Guidepost • Facts regarding the scope of the Report as it concerns Plaintiff
Rolland Slade	<ul style="list-style-type: none"> • Information regarding SBC's engagement of Guidepost • Facts regarding the scope of the Report as it concerns Plaintiff
John E. Carswell	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Eddie Carswell	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant
Pete Hixson	<ul style="list-style-type: none"> • Plaintiff's communications regarding Plaintiff's encounter with Complainant

John E. Carswell III	<ul style="list-style-type: none"> Plaintiff's communications regarding Plaintiff's encounter with Complainant
Shane Pruitt	<ul style="list-style-type: none"> Plaintiff's communications regarding Plaintiff's encounter with Complainant

Initial Disclosure (A)(ii):

Guidepost identifies the following documents in its possession, custody, or control, among others, that may be used to support its claims or defenses:

- Documents related to SBC's engagement of Guidepost
- Documents collected or generated during Guidepost's investigation of Complainant's allegations against Plaintiff, including notes and recordings pertaining to said allegations

Initial Disclosure (A)(iii):

Not applicable

Initial Disclosure (A)(iv):

Guidepost identifies the following insurance agreements or other agreements to satisfy all or part of a possible judgment in this action or to indemnify or reimburse Guidepost for payments made to satisfy such judgment: SBC Engagement Agreement, Section 5.1.

Dated: Nashville, Tennessee
New York, New York
June 22, 2023

RILEY & JACOBSON, PLC

By: /s/ Katharine R. Klein
Katharine R. Klein
1906 West End Avenue
Nashville, Tennessee 37203
(615) 320-3700
KKlein@rjfirm.com

MINTZ & GOLD LLP

By: /s/ Steven G. Mintz

Steven G. Mintz
600 Third Avenue, 25th Floor
New York, New York 10016
(212) 696-4848
mintz@mintzandgold.com

Attorneys for Guidepost Solutions LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served via electronic mail on the following:

Todd G. Cole
Andrew Goldstein.
COLE LAW GROUP, P.C.
1648 Westgate Circle, Suite 301

Brentwood, TN 37027
Telephone: (615) 326-9059
tcollection@colelawgroup.com
agoldstein@colelawgroup.com

Robert D. MacGill
Scott E. Murray
Patrick J. Sanders
MACGILL PC
156 E. Market St.
Suite 1200
Indianapolis, IN 46204
Telephone: (317) 721-1253
robert.macgill@macgilllaw.com
scott.murray@macgilllaw.com
patrick.sanders@macgilllaw.com

Counsel for Plaintiff

Gene Ross Besen
BRADLEY ARANT BOULT
CUMMINGS LLP
1445 Ross Avenue
Suite 3600
Dallas, TX 75202
Telephone: (214) 257-9758
gbesen@bradley.com

*Counsel for the Executive Committee of
the Southern Baptist Convention*

L. Gino Marchetti, Jr.
Matt C. Pietsch
TAYLOR, FIGUE, MARCHETTI &
BLAIR, PLLC
2908 Poston Avenue
Nashville, TN 37203
Telephone: (615) 320-3225
gmmarchetti@tpmblaw.com
matt@tpmblaw.com

*Counsel for the Southern Baptist
Convention*

Scarlett Singleton Nokes
R. Brandon Bundren
E. Todd Presnell
BRADLEY ARANT BOULT
CUMMINGS LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203
Telephone: (615) 244-2582
snokes@bradley.com
bbundren@bradley.com
tpresnell@bradley.com

*Counsel for the Executive Committee
of the Southern Baptist Convention*

on this 22nd day of June, 2023.

s/Katharine R. Klein